

**REMARKS**

Claims 1 and 3-20 are pending in this application. By this Amendment, claims 1, 7, 13 and 17 are amended and claim 2 is cancelled. No new matter is added. Reconsideration of this application is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representatives by Examiner Lewis in the June 8, 2006 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1-20 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,531,997 to Gates et al. ("Gates") in view of U.S. Patent No. 3,612,758 to Evans ("Evans") and further in view of Japanese Patent No. JP 401086116A ("JP6116"). This rejection is respectfully traversed.

Independent claim 1 recites an image display device that includes, *inter alia*, "a voltage applying component by which a voltage is applied . . . which triggers particle movement, and a voltage is applied . . . which is smaller than the potential difference which triggers particle movement, thereby inhibiting a movement of particles at least one of towards and away from an electrode not selected to contribute to the image display, wherein the voltage applying component applies a voltage to the display side electrodes and the rear side electrodes such that a potential difference between the display side electrodes contributing to image display and the display side electrodes not contributing to the image display is smaller than a potential difference between the rear side electrodes contributing to the image display and the rear side electrodes not contributing to the image display, thereby further inhibiting a movement of particles between the display side electrodes contributing to image display and the display side electrodes not contributing to the image display."

Support for this feature may be found in claim 2 and throughout the original specification and drawings. For example, specific support may be found in the original specification and drawings at: page 8, lines 11-18; and page 24, lines 5-22; Figure 4 and Figures 9-16 and the text descriptions thereof; equations 1-20 and the text descriptions thereof; paragraphs at page 6, line 11 through page 8, line 6; page 10, line 22 through page 11, line 16; page 22, line 17 through page 25, line 12; and page 29, line 16 through page 30, line 19.

Such an approach allows embodiments of the claimed invention to produce displays with finer features and hence higher resolution, as described throughout the original specification and drawings. For example, see the original specification at least at page 3, line 17 through page 4, line 11 and at page 8, lines 7 through page 9, line 4, as well as the Figures and text within the original specification identified above.

As demonstrated in Fig. 4, exemplary embodiments of the claimed invention may include any number (e.g., B1-Bn) of display side electrodes and any number of rear side electrodes (e.g., A1-An), and may thereby produce high resolution displays with any number of pixels (i.e., at the respective overlapping intersections between the respective display side electrodes and the respective rear side electrodes). Such higher resolution displays are achieved by **"inhibiting a movement of particles between the display side electrodes contributing to image display and the display side electrodes not contributing to the image display"** by applying a voltage "to the display side electrodes and the rear side electrodes are such that **a potential difference between the display side electrodes contributing to image display and the display side electrodes not contributing to the image display is smaller than a potential difference between the rear side electrodes contributing to the image display and the rear side electrodes not contributing to the image display,**" as recited in claim 1. In this manner, embodiments of the claimed invention

are able to better control movement of particles within the display and to restrict movement of particles which would otherwise degrade the resolution of the display.

Applicants respectfully submit that none of the cited references disclose, teach or suggest such a feature, as recited in claim 1. For example, with respect to the portion of current claim 1 that was recited in former claim 2, the Office Action asserts, at page 5, that Gates teaches such a feature with respect to Fig. 5. Applicants respectfully disagree.

As stated in Gates at col. 26, lines 1-22, Figs. 9A and 9B illustrate two different arrangements for addressing an electrophoretic display. Specific drive schemes related to Figs. 9A and 9B are further described with respect to Figures 10-14.

None of the described drive schemes in Gates address voltage levels applied to display side electrodes and reverse side electrodes that do not contribute to the display, as described at least at paragraphs [0078-0079] of the original specification, as published. Further, nowhere does Gates describe controlling the voltages applied to the display side electrodes and reverse side electrodes that do not contribute to the display in a manner like that described at paragraphs [0022-0023] of the original specification, as published. Specifically, nowhere does Gates teach or suggest that "it is preferable that the voltage applying component applies a voltage to the display side electrodes and the rear side electrodes such that a potential difference between the display side electrodes contributing to image display and the display side electrodes not contributing to the image display is smaller than the potential difference between the rear side electrodes contributing to image display and the rear side electrodes not contributing to image display." Nor does Gates recognize that such a technique may be used to "further decrease the potential difference between the display side electrodes contributing to the image display and the display side electrodes not contributing to the image display, [so that] movement of particles between the neighboring display side electrodes can be prevented, [and] an image with higher precision can be displayed."

For example, Figs. 9-14 only address drive schemes and voltage relationships related to "electrodes contributing to image display," not voltage relationships between "display side electrodes contributing to [an] image display and display side electrodes not contributing to the image display" or between "rear side electrodes contributing to the image display and the rear side electrodes not contributing to the image display," as recited in the claims.

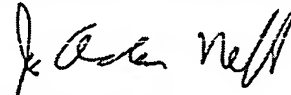
For at least this reason, it is respectfully submitted that independent claim 1 is patentably distinguishable over the applied art. Independent claims 7, 13 and 17 include features similar to the feature described above with respect to claim 1 and are, therefore, patentably distinguishable over the applied art for at least the reasons addressed above with respect to claim 1. The remainder of the claims depend from independent claims 1, 7, 13 and 17 and are likewise distinguishable over the applied art for at least the reasons discussed above, as well as for additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

\* \* \* \*

For at least these reasons, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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